

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

**Jointly Administered under  
Case No. 08-45257**

Petters Company, Inc., et al.,  
Debtors.

Court File No. 08-45257

(includes:  
Petters Group Worldwide, LLC;  
PC Funding, LLC;  
Thousand Lakes, LLC;  
SPF Funding, LLC;  
PL Ltd., Inc.;  
Edge One LLC;  
MGC Finance, Inc.;  
PAC Funding, LLC;  
Palm Beach Finance Holdings, Inc.)

Court Files Nos.:  
08-45258 (GFK)  
08-45326 (GFK)  
08-45327 (GFK)  
08-45328 (GFK)  
08-45329 (GFK)  
08-45330 (GFK)  
08-45331 (GFK)  
08-45371 (GFK)  
08-45392 (GFK)

Chapter 11 Cases  
Judge Gregory F. Kishel

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Douglas A. Kelley, in his capacity as the  
court-appointed Chapter 11 Trustee of  
Debtors Petters Company, Inc. and  
PL Ltd., Inc.,

Plaintiff,

vs.

ADV. NO. 10-04396

Westford Special Situations Master Fund,  
L.P.; et al.,

Defendants.

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**AMENDED NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE NOTICES AND PAPERS**

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**PLEASE TAKE NOTICE** that, pursuant to section 1109(b) of Title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Tobias S. Keller of Jones Day, located at the address listed below, hereby enters his appearance in the above-captioned, jointly administered cases as counsel for Defendants Westford Special Situations Fund L.P.; Westford Asset Management,

LLC; Epsilon Global Active Value Fund L.P.; Epsilon Global Active Value Fund II, L.P.; Epsilon Global Active Value Fund II-B, L.P.; Epsilon Investment Management, LLC; and Steve Goran Stevanovich (collectively the “Epsilon/Westford Defendants”).

Pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that an entry be made on the Clerk’s Matrix in these jointly administered cases and that all notices given or required to be given and all papers served or required to be served in these jointly administered cases by the Debtors, the Court or any other party in interest be given to and served upon:

Tobias S. Keller  
JONES DAY  
555 California Street, 26<sup>th</sup> Floor  
San Francisco, CA 94101  
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E-mail: tkeller@jonesday.com

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statement of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone facsimile transmission, telegraph, telex, or otherwise filed or made in these jointly administered cases.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Service of Notices and Papers shall not be deemed or construed to be a waiver of the Epsilon/Westford Defendants' rights: (a) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (b) to trial by jury in any proceeding so triable in this

case or in any case, controversy or proceeding related to this case; (c) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) of any other rights, claims, actions, setoffs or recoupments to which the Epsilon/Westford Defendants collectively are, or individually is, or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Epsilon/Westford Defendants expressly reserve.

Dated: January 28, 2011

/s/ Tobias S. Keller

Robert T. Kugler (# 0194116)  
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***Attorneys for Defendants Westford Special  
Situations Fund L.P.; Westford Asset  
Management, LLC; Epsilon Global Active Value  
Fund L.P.; Epsilon Global Active Value Fund II,  
L.P.; Epsilon Global Active Value Fund II-B, L.P.;  
Epsilon Investment Management, LLC; and Steve  
Goran Stevanovich***

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ADV. NO. 10-04396

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L.P.; et al.,

Defendants.

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**CERTIFICATE OF SERVICE**

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I, Ma Xiong, declare, under penalty of perjury, that on January 28, 2011, I filed an **Amended Notice of Appearance and Request for Service Notices and Papers** with the Clerk of Bankruptcy Court through ECF, and that ECF will send an e-notice of electronic filing to the following:

**Adam C Ballinger**; aballinger@lindquist.com  
**Daryle Uphoff**; duphoff@lindquist.com  
**Douglas A. Kelley, Trustee**; dkelley@kelleywolter.com  
**James A. Lodoen**; jlodoen@lindquist.com  
**Jeffrey D. Smith**; jsmith@lindquist.com  
**Kirstin D. Kanski**; kkanski@lindquist.com  
**Mark D Larsen**; mlarsen@lindquist.com  
**US Trustee**; ustpregion12.mn.ecf@usdoj.gov

I further certify that I caused a copy of the foregoing document and the Notice of Electronic Filing to be served by First Class Mail on the following parties:

**Capital Strategies Fund Ltd.**  
**Epsilon Active Value Fund II, Ltd.**  
**Epsilon Global Active Value Fund I-B, Ltd.**  
**Epsilon Global Active Value Fund II-B, Ltd.**  
**Epsilon Global Active Value Fund II-G, Ltd.**  
**Epsilon Global Active Value Fund III Ltd.**  
**Epsilon Global Active Value Fund, Ltd.**  
**Epsilon Global Master Fund III - Structured Strategies, L.P.**  
**Stafford Towne, Ltd**  
**Westford Special Situations Fund Ltd.**  
HWR Services Limited  
Craigmuir Chambers  
PO Box 71  
Road Town, Tortola  
British Virgin Islands

**Epsilon Global Active Value Fund II-G, L.P.**  
National Registered Agents  
160 Greentree Drive, Suite 101  
Dover, DE 19904

**Epsilon Global Active Value Fund III Ltd**  
**Epsilon Global Master Fund III - Structured Strategies, L.P.**  
c/o Steve Goran Stevanovich  
7521 Isla Verde Way  
Delray Beach, FL 33446

**Epsilon Global Asset Management, Ltd.**  
**Epsilon Global Master Fund II, L.P.**  
**Epsilon Global Master Fund L.P.**  
**Westford Global Asset Management, Ltd.**  
**Westford Special Situations Master Fund, L.P.**  
Maples and Calder  
PO Box 309, Ugland House  
South Church Street  
George Town  
Grand Cayman KY1-1104  
Cayman Islands

**Epsilon Investment Management, LLC**  
**Westford Asset Management, LLC**

First Canadian Place  
100 King Street West  
Suite 5715  
Toronto M5X 1 A9 Ontario  
Canada

**Stafford Towne, Ltd.**

7280 W. Palmetto Park Road  
Boca Raton, FL 33433

Dated: January 28, 2011

/s/ Ma Xiong  
Ma Xiong